



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

March 17, 2014

Sandra Henning, District Ranger  
3160 NE 3<sup>rd</sup> Street  
Prineville, Oregon 97754

Re: U.S. Environmental Protection Agency comments on the Wolf Fuels and Vegetation Management Project Draft Environmental Impact Statement (EPA Project Number: 13-0016-AFS).

Dear Ms. Henning:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the proposed Wolf Fuels and Vegetation Management Project on the Pauline Ranger District of the Ochoco National Forest. Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The DEIS analyzes the Forest Service's proposal to implement fuel and vegetation treatments that would reduce the risk of stand loss due to overly dense stand conditions, increase the resistance of forest stands to insects and diseases, and change the distribution of fire regimes. Three action alternatives and a no action alternative are analyzed. Alternative 3 has been identified as the preferred alternative. Proposed treatments under preferred alternative would include commercial and noncommercial vegetation treatments on approximately 5,694 acres; prescribed fire on 5,000 acres; juniper removal on 481 acres, underburning on 5,000 acres (outside of harvest units) and hardwood enhancement on 75.5 acres. The preferred alternative would require 1.8 miles of temporary road construction, and 17.6 miles of temporary road construction on existing disturbance. The preferred alternative would also implement watershed improvements including road closures, road decommissioning, stream restoration, culvert replacement, and headcut repair. The project units would be located within a 24,506 acre project area.

The EPA is supportive of the overarching goals and objectives of the proposed project, and we find the DEIS to be clear, well organized, and robust. We also appreciate the Forest's responsiveness to issues raised during the scoping process. In particular, we appreciate the site specific analysis and prescription development within the Riparian Habitat Conservation Areas and the document's thoughtful approach to vegetation treatments. Overall, we find the treatments proposed under Alternative 3 to align well with the broad body of science emerging about dry and moist mixed conifer forests<sup>1</sup>. We are less supportive of Alternative 4 as we believe the ecological return would be less in terms of quality and duration when compared to Alternative 3.

We also appreciate the thoughtful approach taken by the Forest and the Ochoco Forest Restoration Collaborative to the proposed removal of grand fir and douglas fir that are over 21 inches diameter at

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<sup>1</sup> [http://www.fs.fed.us/pnw/publications/MMC\\_Synthesis\\_24Feb14.pdf](http://www.fs.fed.us/pnw/publications/MMC_Synthesis_24Feb14.pdf)

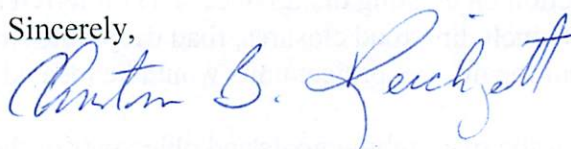
breast height. We are supportive of the criteria to guide marking established in Appendix G of the DEIS. In general, the view of the EPA is that while the eastside screening of trees over 21 inches has served to build trust among stakeholders and protect important remnant medium and large trees, science now supports a more ecologically-based approach. Such an approach should take into account geographic context, tree size, tree age, tree species, spatial distribution, relative abundance, the historical (and future) range of variability and other considerations such as forest health. The potential of an area to grow large trees should also be considered. An approach that does not allow for the consideration of these factors impedes ecologically based landscape-level management.

With regard to proposed activity within the RHCAs, we are pleased to note that the primary shade zones defined in Table 174 are considered as a minimum. The EPA has over time expressed some concern over the methodology used to develop this table. That concern stems in part from the method's exclusion of potential solar loading before 10 a.m. and after 2:00 p.m. We are supportive of Alternative 3 as developed because of the site specific analysis, project design criteria and best management practices incorporated into the design of the alternatives. We also anticipate that some of these stands will be subject to multiparty monitoring field reviews to evaluate pre-treatment marking and post treatment implementation consistent with the direction laid out in Appendix G. The EPA would welcome the opportunity to participate in one of these field reviews.

Finally, we appreciate the inclusion of recent science related to moist mixed conifer stands. We encourage the Forest to likewise consider recent science related to peak flow. Page 324 of the DEIS offers a discussion of peak flow that relies largely on older references. We do not disagree with the conclusions reached in the DEIS, but we recommend that the FEIS include updated references in the FEIS, such as Gordon et al. (2008)<sup>2</sup>.

Based on our review, we are rating the DEIS as LO (Lack of Objections). We appreciate the opportunity to review and comment on the DEIS, and we look forward to furthering our understanding of this and other projects that develop through the collaborative efforts of the Ochoco Forest Restoration Collaborative. If you have any questions about our review, please contact me at (206) 553-1601, or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov). Or you may contact Teresa Kubo of my staff at 503-326-2859 or by electronic mail at [kubo.teresa@epa.gov](mailto:kubo.teresa@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

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<sup>2</sup> Grant, Gordon E.; Lewis, Sarah L.; Swanson, Frederick J.; Cissel, John H.; McDonnell, Jeffrey J. 2008. Effects of forest practices on peak flows and consequent channel response: a state-of-science report for western Oregon and Washington. Gen. Tech. Rep. PNW-GTR-760. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 76 p

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.